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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In the Matter of the Search of:

Case Number:

17M 49

the US Priority Mail Express package bearing tracking number EL478964119US, the US Priority Mail Express package bearing tracking number EL577701017US, the US Priority Mail Express package bearing tracking number EL617282678US, and the US Priority Mail Express package bearing the tracking number EL613816244US, further described in Attachment A

APPLICATION AND AFFIDAVIT FOR A SEARCH WARRANT

I, Michael Todd, a Postal Inspector of the U.S. Postal Inspection Service, request a search warrant and state under penalty of perjury that I have reason to believe that in the following package:

See Attachment A

located in the Northern District of Illinois, there is now concealed:

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is evidence, instrumentalities, and contraband.

The search is related to a violation of:

Code Section

Title 21, United States Code, Section 843(b)

Offense Description

the use of a communications facility to distribute narcotics

The application is based on these facts:

See Attached Affidavit,

Continued on the attached sheet.

FILED

FEB 01 2017

MAGISTRATE JUDGE
YOUNG B. KIM

Sworn to before me and signed in my presence.

Date: February 1, 2017

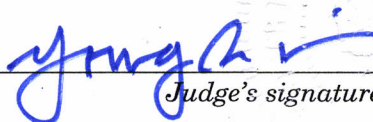
City and State: Chicago, Illinois



Applicant's Signature

MICHAEL TODD, Postal Inspector, U.S. Postal Inspection Service

Printed name and title



Judge's signature

YOUNG B. KIM, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT)
)
NORTHERN DISTRICT OF ILLINOIS)

AFFIDAVIT

I, Michael Todd, being duly sworn, state as follows:

1. I am a Postal Inspector with the U.S. Postal Inspection Service. I have been so employed since approximately July 2014.

2. As part of my duties as a USPIS Postal Inspector, I investigate criminal violations relating to violations of the federal laws relating to the mails and to controlled substances.

3. This affidavit is made in support of an application for a warrant to search the US Priority Mail Express Parcel with Tracking Number EL478964119US ("**Subject Parcel 1**"), the US Priority Mail Express Parcel with Tracking Number EL577701017US ("**Subject Parcel 2**"), the US Priority Mail Express Parcel with Tracking Number EL617282678US ("**Subject Parcel 3**"), and the US Priority Mail Express Parcel with Tracking Number EL613816244US ("**Subject Parcel 4**"), (collectively, the "**Subject Parcels**") each of which is described further in Attachment A, for evidence, instrumentalities, and contraband described further in Attachment B, concerning narcotics offenses, in violation of Title 21, United States Code, Section 843(b).

4. The statements in this affidavit are based on my personal knowledge, and on information I have received from other law enforcement personnel and from

persons with knowledge regarding relevant facts. Because this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth facts that I believe are sufficient to establish probable cause to believe that evidence, instrumentalities, and contraband of violations of Title 21, United States Code, Section 843(b), are located within the **Subject Parcels**.

**FACTS SUPPORTING PROBABLE CAUSE TO
SEARCH THE SUBJECT PARCELS**

5. On February 1, 2017, I inspected the **Subject Parcels** at JT Weeker International Service Center in Chicago, IL in Chicago, Illinois.

Subject Parcel 1

6. **Subject Parcel 1** was mailed on January 31, 2017, from Burbank, California 91505 and is addressed to "Andrew Joiner, 14N634 Oliver Dr., Elgin, IL 60124," with a return address of "Alexander, 3154 Glendale Blvd., Ste 130, Los Angeles, CA 90039."

7. **Subject Parcel 1** bears \$24.45 in postage, measures approximately 10 inches by 6.75 inches by 2.75 inches, and weighs approximately 0 pounds and 11 ounces.

8. I observed a characteristic about **Subject Parcel 1** that, in my training and experience, can be consistent with parcels containing a controlled substance. I ran the sender and recipient names and addresses on **Subject Parcel 1** through a law enforcement database. Based on my review of the law enforcement database

results, the sender address exists; however, the name "Alexander" does not associate with that address. Based on my training and experience, fictitious sender names and fictitious return addresses can indicate that the sender does not want to be associated with the parcel.

Subject Parcel 2

9. **Subject Parcel 2** was mailed on January 31, 2017, from Fountain Hills, Arizona 85268 and is addressed to "Russell Haisman, 23772 West Lake Vista Ave., Antioch, IL 60002," with a return address of "Austin Brown, 1739 E. Broadway Road, Mesa, AZ 85204." **Subject Parcel 2** bears \$47.45 in postage, measures approximately 12 inches by 3.5 inches by 14.125 inches, and weighs approximately 2 pounds and 6 ounces.

10. I observed characteristics about **Subject Parcel 2** that, in my training and experience, can be consistent with parcels containing a controlled substance. I ran the sender and recipient names and addresses on **Subject Parcel 2** through a law enforcement database. Based on my review of the law enforcement database results, the purported sender's address does not exist. Based on my training and experience, fictitious sender or recipient addresses can indicate that the sender or recipient does not want to be associated with the parcel. In addition, the package's seams are sealed. Based on my training and experience, packages contain sealed seams to mask the odor of the parcel's contents.

Subject Parcel 3

11. **Subject Parcel 3** was mailed on January 31, 2017, from Chicago, Illinois 60637 and is addressed to “Kira Collins, 9054 Whitaker Avenue, Los Angeles, CA 91343,” with a return address of “Devon Foster, 3583 W. 123rd, Alsip, IL 60803.” **Subject Parcel 3** bears \$53.45 in postage, measures approximately 15.5 inches by 12.5 inches by 3 inches, and weighs approximately 3 pounds and 4 ounces.

12. I observed characteristics about **Subject Parcel 3** that, in my training and experience, can be consistent with parcels containing a controlled substance. I ran the sender and recipient names and addresses on **Subject Parcel 3** through a law enforcement database. Based on my review of the law enforcement database results, the recipient’s address is real; however, the name “Kira Collins” does not associate with the address. Based on my training and experience, fictitious sender or recipient names can indicate that the sender or recipient does not want to be associated with the parcel. In addition, the package contains a signature waiver. Based on my training and experience, packages containing a signature waiver can indicate that the recipient does not want to be associated with the parcel.

Subject Parcel 4

13. **Subject Parcel 4** was mailed on January 31, 2017, from Glendale Heights, Illinois 60139 and is addressed to “AL Lamas, 10296 S Plendor Ridge, Las Vegas, NV 89135,” with a return address of “M. Berger, 1N556 Park Blvd, Glen Ellyn,

IL 60137.” **Subject Parcel 4** bears \$23.75 in postage, measures approximately 12.5 inches by 9 inches by .5 inches, and weighs approximately 1 pound and 10 ounces.

14. I observed characteristics about **Subject Parcel 4** that, in my training and experience, can be consistent with parcels containing a controlled substance. I ran the sender and recipient names and addresses on **Subject Parcel 4** through a law enforcement database. Based on my review of the law enforcement database results, the recipient address is real; however, the name “AL Lamas” does not associate with the address. Based on my training and experience, fictitious sender or recipient names can indicate that the sender or recipient does not want to be associated with the parcel. In addition, the package contains a signature waiver. Based on my training and experience, packages containing a signature waiver can indicate that the recipient does not want to be associated with the parcel.

Canine Inspection

15. Each of the characteristics I describe above for the **Subject Parcels** can be consistent with parcels that do not contain contraband. Based on my training and experience, however, the combination of these characteristics led me to investigate further by calling in a narcotics dog to perform further examination of the **Subject Parcels**. On February 1, 2017, I arranged for a United States Customs and Border Protection Canine Officer and his canine partner, “Iella,” to meet with me and examine the **Subject Parcels**. According to the Canine Officer, Iella is certified annually by United States Customs and Border Protection as a narcotics dog. Iella


was most recently re-certified in September 13, 2016. Iella is trained to sniff buildings, vehicles, envelopes, and wrapped parcels to detect the odors of heroin, cocaine, marijuana, hash, methamphetamine, ecstasy, and other controlled substances that could be contained inside. Iella is also trained to indicate the presence of such substances or their scents by alerting to the item he is sniffing. In addition, according to USPIS records, Iella has successfully alerted to controlled substances in U.S. Mail Parcels and letters on 66 occasions since November 2013, with a success rate of approximately 97%. To the best of my knowledge, U.S. Customs and Border Protection does not maintain records regarding the overall success rate for its drug detection dogs, and therefore only the USPIS success rate is available.

16. On February 1, 2017, at the Postal Service International Service Center at O'Hare Airport in Chicago, Illinois, I arranged four controlled substance detection tests by separately placing the **Subject Parcels** among approximately 20 other parcels each in the workroom area in successive tests. Each time, I then witnessed Iella examine the parcels and I observed Iella alert by sitting next to the **Subject Parcels**. Iella did not alert to any of the other parcels in any of the tests. The Canine Officer informed me that Iella's actions indicated the presence of narcotics and/or controlled substances in the **Subject Parcels**. I then took custody of the **Subject Parcels**.

CONCLUSION


17. Based on the above information, I respectfully submit that there is probable cause to believe that the use of a communications facility to distribute narcotics, in violation of Title 21, United States Code, Section 843(b), has been committed, and that evidence, instrumentalities, and contraband relating to this criminal conduct, as further described in Attachment B, will be found in the **Subject Parcels**, as further described in Attachment A. I therefore respectfully request that this Court issue a search warrant for the **Subject Parcels** more particularly described in Attachment A, authorizing the seizure of the items described in Attachment B.

FURTHER AFFIANT SAYETH NOT.



Michael Todd
Postal Inspector
U.S. Postal Inspection Service

Subscribed and sworn
before me this 1st day of February, 2017



Honorable YOUNG B. KIM
United States Magistrate Judge

ATTACHMENT A

DESCRIPTION OF ITEM TO BE SEARCHED

The US Priority Mail Express Parcel with Tracking Number EL478964119US, bearing a return address of "Alexander, 3154 Glendale Blvd., Ste 130, Los Angeles, CA 90039," and a recipient address of "Andrew Joiner, 14N634 Oliver Dr., Elgin, IL 60124." **Subject Parcel 1** weighs approximately 0 pounds and 11 ounces, is approximately 10 inches by 6.75 inches by 2.75 inches in size, and bears \$24.45 in postage.

The US Priority Mail Express Parcel with Tracking Number EL577701017US, bearing a return address of "Austin Brown, 1739 E. Broadway Road, Mesa, AZ 85204," and a recipient address of "Russell Haisman, 23772 West Lake Vista Ave., Antioch, IL 60002." **Subject Parcel 2** weighs approximately 2 pounds and 6 ounces, is approximately 12 inches by 3.5 inches by 14.125 inches, and bears \$47.45 in postage.

The US Priority Mail Express Parcel with Tracking Number EL617282678US, bearing a return address of "Devon Foster, 3583 W. 123rd, Alsip, IL 60803," and a recipient address of "Kira Collins, 9054 Whitaker Avenue, Los Angeles, CA 91343." **Subject Parcel 3** weighs approximately 3 pounds and 4 ounces, is approximately 15.5 inches by 12.5 inches by 3 inches, and bears \$53.45 in postage.

The US Priority Mail Express Parcel with tracking number EL613816244US, bearing a return address of "M. Berger, 1N556 Park Blvd, Glen Ellyn, IL 60137," and

a recipient address of "AL Lamas, 10296 S Plendor Ridge, Las Vegas, NV 89135."

Subject Parcel 4 weighs approximately 1 pound and 10 ounces, is approximately 12.5 inches by 9 inches by .5 inches, and bears \$23.75 in postage.

ATTACHMENT B

LIST OF ITEMS TO BE SEIZED

Evidence, instrumentalities and contraband concerning violation of Title 21, United States Code, Section 843(b), as follows:

1. Controlled substances;
2. Packaging for controlled substances;
3. United States currency;
4. Items associated with the distribution, manufacture, and possession of controlled substances; and
5. Items that may assist in identifying the sender or receiver of the **Subject Parcels.**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In the Matter of the Search of:

Case Number:

17M-49

the US Priority Mail Express package bearing tracking number EL478964119US, the US Priority Mail Express package bearing tracking number EL577701017US, the US Priority Mail Express package bearing tracking number EL617282678US, and the US Priority Mail Express package bearing the tracking number EL613816244US, further described in Attachment A

SEARCH AND SEIZURE WARRANT

To: Michael Todd and any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the Northern District of Illinois:

See Attachment A

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal:

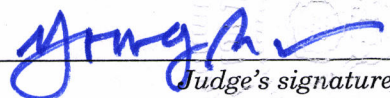
See Attachment B

YOU ARE HEREBY COMMANDED to execute this warrant on or before February 15, 2017 in the daytime (6:00 a.m. to 10:00 p.m.).

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to the issuing United States Magistrate Judge.

Date and time issued: February 1, 2017 @ 3:44pm


Judge's signature

City and State: Chicago, Illinois

YOUNG B. KIM, U.S. Magistrate Judge
Printed name and title

AO 93 (Rev. 11/13) Search and Seizure Warrant (Page 2)

Return

Case No:

Date and Time Warrant Executed:

Copy of Warrant and Inventory Left With:

Inventory made in the presence of:

Inventory of the property taken and name of any person(s) seized:

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: _____

*Executing officer's signature*_____
Printed name and title

ATTACHMENT A

DESCRIPTION OF ITEM TO BE SEARCHED

The US Priority Mail Express Parcel with Tracking Number EL478964119US, bearing a return address of "Alexander, 3154 Glendale Blvd., Ste 130, Los Angeles, CA 90039," and a recipient address of "Andrew Joiner, 14N634 Oliver Dr., Elgin, IL 60124." **Subject Parcel 1** weighs approximately 0 pounds and 11 ounces, is approximately 10 inches by 6.75 inches by 2.75 inches in size, and bears \$24.45 in postage.

The US Priority Mail Express Parcel with Tracking Number EL577701017US, bearing a return address of "Austin Brown, 1739 E. Broadway Road, Mesa, AZ 85204," and a recipient address of "Russell Haisman, 23772 West Lake Vista Ave., Antioch, IL 60002." **Subject Parcel 2** weighs approximately 2 pounds and 6 ounces, is approximately 12 inches by 3.5 inches by 14.125 inches, and bears \$47.45 in postage.

The US Priority Mail Express Parcel with Tracking Number EL617282678US, bearing a return address of "Devon Foster, 3583 W. 123rd, Alsip, IL 60803," and a recipient address of "Kira Collins, 9054 Whitaker Avenue, Los Angeles, CA 91343." **Subject Parcel 3** weighs approximately 3 pounds and 4 ounces, is approximately 15.5 inches by 12.5 inches by 3 inches, and bears \$53.45 in postage.

The US Priority Mail Express Parcel with tracking number EL613816244US, bearing a return address of "M. Berger, 1N556 Park Blvd, Glen Ellyn, IL 60137," and

a recipient address of "AL Lamas, 10296 S Plendor Ridge, Las Vegas, NV 89135."

Subject Parcel 4 weighs approximately 1 pound and 10 ounces, is approximately 12.5 inches by 9 inches by .5 inches, and bears \$23.75 in postage.

ATTACHMENT B

LIST OF ITEMS TO BE SEIZED

Evidence, instrumentalities and contraband concerning violation of Title 21, United States Code, Section 843(b), as follows:

1. Controlled substances;
2. Packaging for controlled substances;
3. United States currency;
4. Items associated with the distribution, manufacture, and possession of controlled substances; and
5. Items that may assist in identifying the sender or receiver of the

Subject Parcels.